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Public Comments on Framework for Next Generation 911 Deployment: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications:=====

Title: Framework for Next Generation 911 Deployment: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications

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I agree with the changes that this proposed rule wishes to bring 911. The current 911 system so far has not adapted to the change in habits of Americans in the use of cell-phones. As noted before 70 percent of Americans with cell-phones use texting and there have been instances where people have attempted to text 911. In regards to section 39, I cannot give an exact figure, but in an interview in an article in the Corvallis-Gazette Times titled "Texting 911 in the works," Mark Tennyson, chairman of the Next Generation Committee and staff member at Oregon Emergency Management said that many students attempted to text 911 during the Virginia Tech Shootings. He also remarks about significant consumer demand regarding the use of NG911 technology, but does not give an exact figure.

There are several concerns regarding the use of NG911. I am no technical expert, however with limited abilities to track the location and owners of cell phones, the possibility of 'prank' texts could exist. It is for this reason that I would like to see ways for the NG911 operators to track calls and texts from cell-phones included within this rule. There could very well be some legality issues surrounding this, however I am unsure.

In regards to SMS based text-messaging, I believe that it can be useful, however with the ever-evolving technology used in cell-phones it could become obsolete, making SMS NG911 technology more of an interim solution than a permanent system. One thing I would advise if this system were to be implemented would be to start a public education program much like was done for the 911 number. This program should include the proper format for texting NG911. There is a tendency among some users of SMS to abbreviate, shorten or misspell words or use slang, which could lead to confusion between dispatcher and caller. To combat this, I would suggest either a campaign to promote proper etiquette, train dispatchers on how to translate SMS to a workable language or both